

Parrish, John

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**From:** Barbara Byron [bbyron@energy.state.ca.us]  
**Sent:** Thursday, November 17, 2005 9:05 AM  
**To:** Parrish, John; CGS Headquarters; Ebailey@dhs.ca.gov; JWong@dtsc.ca.gov; Hbaqai.ca.gov.waterboards@energy.state.ca.us; hsinger.ca.gov.waterboards@energy.state.ca.us  
**Subject:** RE: Draft Comments on EPA's Draft Proposed Radiation Protection Standard for Yucca Mt.

Thanks, John, for your great suggestions. I'll ask our CA water quality experts (Harold or Hisam) what they might suggest for added language. They may have already addressed this in their comments.

Barbara

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>>> "Parrish, John" <John.Parrish@conservation.ca.gov> 11/16/05 5:54 PM  
>>>  
Barbara --

I think what you have so far is very good. May I suggest that another facet of this response be considered. Item #2 discusses the installation of a monitoring well system -- which should be in place and operational prior to the commencement of storage activities. Perhaps we should also address the need for the EPA -- or whatever other Federal regulatory agency -- to also have devised and ready for action a containment plan/clean up plan/decontamination plan if the monitoring wells detect radioactivity in excess of the standard allowed. That is, it is not enough just to monitor leakage via the groundwater path, but perhaps there should be a plan to deal with that contaminated leakage before the plume spreads too far. We should be prepared that leakage could occur in 100 years, and not after 10,000 years. This could be a separate item, or slipped into Item #4.

Regards -- JGP

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-----Original Message-----

From: Barbara Byron [mailto:Bbyron@energy.state.ca.us]  
Sent: Wednesday, November 16, 2005 5:18 PM  
To: CGS Headquarters; Parrish, John; Ed Bailey; Jeff Wong; Hisam Baqai; Harold Singer  
Subject: Draft Comments on EPA's Draft Proposed Radiation Protection Standard for Yucca Mt.

Hi,

Here's a very rough draft of our comments on EPA's proposed radiation protection standards for Yucca Mt. The "Background" section probably needs to be shortened, but I left it long to provide some background for the CA agency reviewers. Please let me know if you have any comments or suggestions by this Friday. EPA's deadline for comments is Monday, Nov. 21.

It's difficult grasping a radiation protection compliance period lasting 10,000 to a million years. However, the National Academy of Sciences' findings and recommendations on the Yucca Mountain standards don't appear to be adequately reflected in EPA's proposed standards. NAS said EPA shouldn't limit the compliance period to 10,000 years, since the maximum release of radioactive materials from the repository are expected to occur after 10,000 years. Although EPA's compliance standard extends out to a million years, they are proposing a more stringent standard until 10,000 years compared to later years when most of the leakage from the repository is expected to occur.

Some CA agencies have suggested that we include a recommendation to establish a groundwater monitoring program. Is there more we should say about what kind of program that might include?

The Lahontan Regional Water Quality Control Board is preparing comments as well, which will be included in a packet of CA comments to EPA.

Again, please let me know if you have any suggestions or comments by this Friday. Thanks.

Barbara Byron

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